

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-cr-20008
16-cr-20466-01
17-cr-20200 (2)

Hon. Matthew F. Leitman

JARED LOCKWOOD

Defendant.

John Meixner
Assistant United States Attorney
Office of the United States Attorney
211 W. Fort Street, Suite 2001
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313.226.9110

David S. Steingold (P29752)
Law Offices of David S. Steingold, PLLC
Attorney for Defendant
500 Griswold Street, Suite 2320
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NOTICE OF FACTUAL DEVELOPMENTS

Defendant Jared Lockwood, through his attorney, David S. Steingold, notify the Court of the following factual developments pertinent to Mr. Lockwood's Motion for Compassionate Release:

1. In the Government's Opposition to Mr. Lockwood's Motion for Compassionate Release, the Government indicated that Mr. Lockwood was scheduled to receive treatment in September. ECF No. 56 Page ID 741.
2. The medical records submitted with the Government's Opposition showed that Mr. Lockwood was scheduled to see Dr. Nathaniel Graham for a "Specialty Procedure" on September 30, 2020. Gov. Exh. A at 56.
3. Mr. Lockwood did not see Dr. Graham until October 13, 2020.

4. An ultrasound was not performed during this visit and Mr. Lockwood was told he would not receive one anytime soon because the necessary equipment was not available in the facility.
5. At this visit, Mr. Lockwood was prescribed omeprazole, a medication used to treat acid reflux. Mr. Lockwood never indicated that he had any concerns with acid reflux and Dr. Graham did not suggest that this could be a cause of Mr. Lockwood's abdominal pain.
6. Mr. Lockwood was told he would be scheduled for other tests to determine the cause of his pain but none have been performed as of this date.
7. Mr. Lockwood pain has worsened. He has not been provided medical treatment to determine the cause of his symptoms or to alleviate his pain.

Respectfully submitted,

/s/ David S. Steingold
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Dated: October 30, 2020

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CERTIFICATE OF SERVICE

DAVID S. STEINGOLD (P 29752) hereby certifies that on October 30, 2020, I electronically filed the above-annexed pleading with the United States District Court for the Eastern District of Michigan using the ECF/CM electronic filing system which will automatically send electronic notification of this filing to all attorneys of record for all parties.

Respectfully submitted,

/s/ David S. Steingold

DAVID S. STEINGOLD (P29752)